

EXHIBIT 48

**REDACTED VERSION OF
DOCUMENT SOUGHT TO BE
SEALED**

CONFIDENTIAL - ATTORNEYS EYES ONLY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
)
Plaintiff,)
) Case No.
vs.) 3:17-cv-00939-WHA
)
UBER TECHNOLOGIES, INC.,)
OTTOMOTTO LLC; OTTO TRUCKING)
LLC,)
)
Defendants.)
_____)

*** CONFIDENTIAL - ATTORNEYS' EYES ONLY ***

VIDEOTAPED DEPOSITION OF GAETAN PENNECOT
San Francisco, California
Thursday, April 20, 2017
Volume I

Reported by:
CARLA SOARES
CSR No. 5908
Job No. 2599854

Pages 1 - 95

Page 1

1 A I don't know. 09:30:29

2 Q Did you work on the -- on fiber lasers at
3 Google?

4 A So what do you mean by "work on fiber
5 lasers"? 09:30:50

6 Q Was one of the LiDAR projects that you
7 worked on, did it use fiber lasers?

8 A Papa Bear was.

9 Q And are you familiar with how the
10 amplification of the fiber laser worked? 09:31:06

11 A Not at all.

12 Q Okay. Why did you leave Google and now
13 Waymo?

14 A I had issues with my commute.

15 Q Anything else? 09:31:24

16 A Actually, there's a list of reasons. I
17 was -- so number one is commute. So I was not happy
18 being in my car, like, three hours every day.

19 The second reason, which is, like, kind of
20 complicated reason, but you've heard about the 09:31:51
21 Chauffeur plan.

22 In December, like on December 31st, I
23 guess -- no, I don't remember. Like, sometime
24 before, in 2015, the Project Chauffeur got a
25 valuation. This valuation was pretty high. And 09:32:20

CONFIDENTIAL - ATTORNEYS EYES ONLY

1 although, like, it's not my main reason, that was 09:32:30

2 another reason.

3 I felt that [REDACTED]

[REDACTED]

[REDACTED] 09:32:47

6 [REDACTED]

[REDACTED]

8 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17 A So I didn't understand everything, and it

18 was really hard to ask questions about this plan

19 since our HR people were not really aware of it, or,

20 like, people in charge of the compensation. So 09:34:00

21 there was nobody to talk to.

22 Can you repeat the question?

23 Q Well, let me see if I can just cut through

24 this a little bit easier.

25 So you left Waymo to join Otto because you 09:34:14

Page 26

1 wanted to get money, and your commute was too long? 09:34:19

2 A So I didn't left [sic] Waymo to join Otto.

3 I left Waymo. Then I joined Otto.

4 So the commute was a big reason, and I

5 thought it was a good time to leave. 09:34:45

6 Basically, like, in some ways, I was

7 artificially kept at Google through this plan. So I

8 could have stayed a little longer, but then I got

9 scared about the possibility of this plan going

10 down. 09:35:06

11 Q You wanted to get your money while it was

12 still at a high valuation; is that fair?

13 A This money represented a lot for me that

14 was more than -- so yeah, that was significant.

15 Q Did you ever talk with Mr. Levandowski 09:35:30

16 about this?

17 A About?

18 Q The valuation of Project Chauffeur and

19 whether to leave now or later.

20 A About the valuation going down? 09:35:40

21 Q Yes.

22 A No.

23 Q When did you leave Waymo?

24 A April 1st, 2016.

25 Q When did you join Otto? 09:35:56

Page 27

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were administered an oath; that
8 a record of the proceedings was made by me using
9 machine shorthand which was thereafter transcribed
under my direction; that the foregoing transcript is
a true record of the testimony given.

10 Further, that if the foregoing pertains to
11 the original transcript of a deposition in a Federal
12 Case, before completion of the proceedings, review
of the transcript [] was [x] was not requested

13 I further certify I am neither financially
14 interested in the action nor a relative or employee
15 of any attorney or any party to this action.

16 IN WITNESS WHEREOF, I have this date
17 subscribed my name.

18
19 Dated: April 20, 2017
20
21

22 
23

24 CARLA SOARES

25 CSR No. 5908